

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROSA RAMIREZ, on behalf of herself and all other
persons similarly situated, known and unknown,)

Plaintiff,)

v.)

STAFFING NETWORK HOLDING, LLC d/b/a)
STAFFING NETWORK and PHILIPS)
ELECTRONICS NORTH AMERICA)
CORPORATION, and PONTOON SOLUTIONS,)
INC.)

Case No. 13 C 6501

Judge Lee

Magistrate Judge Valdez

**MOTION TO EXTEND DEADLINE TO FILE MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT ON CLASS-WIDE BASIS**

The Plaintiff Rosa Ramirez (“Plaintiff”), by and through her attorneys, hereby files this motion to extend the deadline to file a Motion for Preliminary Approval of Settlement on Class-wide Basis. In support thereof, the Plaintiff states as follows:

1. Plaintiff filed a class action complaint in this action against Defendant Staffing Network Holdings, LLC, and Philips Electronics North America Corporation on September 11, 2013. Plaintiff filed her First Amended Complaint adding Pontoon Solutions, Inc as a Defendant on this matter on April 1, 2014. See Docket Entry No. 43.

2. On November 6, 2014, Plaintiff and all Defendants in this matter reported to this Court that they had reached a class-wide settlement in this matter. (Dkt. No. 97.). This Court set December 12, 2014 as the deadline by which Plaintiff would file an Unopposed Motion for Preliminary Approval of Class-wide Settlement reached between the Parties.

3. On December 12, 2014, the Parties filed a joint motion requesting additional time to finalize the written Settlement Agreement between them, because in finalizing the stipulation

of settlement, the Parties encountered a disagreement concerning two of the material terms of settlement. *See*. Dkt. No. 101.

4. In an effort resolve the disagreement between the Parties, on December 19, 2014, the Parties held a conference call with former Magistrate Judge Morton Denlow, who on October 23, 2014 assisted the Parties in an all day mediation to explore settlement in this matter.

5. The Parties are still working to resolve their disagreement and finalize a stipulation of settlement in this matter and will re-engage Magistrate Judge Morton Denlow to mediate the disagreement between the Parties.

6. Accordingly, the Plaintiff requests that the deadline to file a Stipulation of Settlement on a Class-wide basis be extended through February 2, 2015 so that the Parties can continue to work to resolve their disagreement amicably.

7. If the Parties are unable to resolve their disagreement, Plaintiff anticipates filing a Motion to enforce the settlement agreement reached between the Parties on a Classwide basis by or before February 2, 2015.

WHEREFORE, Plaintiff respectfully requests that this Court extend the deadline by which to file Plaintiff's Unopposed Motion for Approval of a Settlement on a Class-wide basis through February 2, 2015.

Respectfully Submitted,

Dated: January 12, 2015

s/Alvar Ayala
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